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**FILED**  
DISTRICT COURT OF GUAM

FEB 05 2008

**JEANNE G. QUINATA**  
Clerk of Court

**FORREST BOOTH (Cal. Bar No. 74166) (Admitted *pro hac vice*)**  
**RYAN C. DONLON (Cal. Bar No. 229292) (Admitted *pro hac vice*)**

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Attorneys for Defendant, Cross-Claimant and  
Counterclaimant S.J. GARGRAVE SYNDICATE 2724  
9ZP492W

**IN THE DISTRICT COURT OF GUAM**

**TERRITORY OF GUAM**

UNITED STATES OF AMERICA,

Plaintiff,

and

INCHCAPE SHIPPING SERVICES GUAM,  
LLC,

Plaintiff in Intervention,

vs.

MARWAN SHIPPING & TRADING CO.,  
FIVE SEAS SHIPPING CO., LLC, and S.J.  
GARGRAVE SYNDICATE 2724,  
*in personam*,

Defendants.

AND CROSS-CLAIMS, COUNTERCLAIM,  
AND CLAIM IN INTERVENTION

Case No.: 1:06-CV-00011

**NOTICE OF MOTION OF S. J.  
GARGRAVE SYNDICATE 2724'S FOR  
DEFAULT JUDGMENT AGAINST  
NAVIGATORS INSURANCE CO., DBA  
NAVIGATORS PROTECTION &  
INDEMNITY**

**[NO ORAL ARGUMENT REQUESTED]**

Complaint Date: April 19, 2006  
Trial Date: May 12, 2008

1 TO: NAVIGATORS INSURANCE CO., dba NAVIGATORS PROTECTION &  
2 INDEMNITY; AND

3 TO: ITS ATTORNEYS OF RECORD, THOMAS C. STERLING, STANLEY  
4 L.GIBSON AND ELLEN G. LAUCK

5 PLEASE TAKE NOTICE that S. J. Gargrave Syndicate 2724 has have filed its motion  
6 for a default judgment against Navigators Insurance Co., dba Navigators Protection &  
7 Indemnity, no hearing being requested. Copies of the application, Declaration of Forrest Booth  
8 of Amounts Due, and the proposed Order are delivered herewith.

9 Dated this 5<sup>th</sup> day of February, 2008.

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13 THOMAS McKEE TARPLEY  
14 Attorney for Defendant, Cross-Claimant  
15 and Counterclaimant S. J. GARGRAVE  
16 SYNDICATE 2724  
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1 **CERTIFICATE OF SERVICE**

2 I, Dorothea Quichocho, hereby certify pursuant to Rule 5(d) Fed. R. Civ. P. that on  
3 February 5, 2008, I caused to be served a true and correct copy of **NOTICE OF**  
4 **MOTION OF S. J. GARGRAVE SYNDICATE 2724'S FOR DEFAULT JUDGMENT**  
5 **AGAINST NAVIGATORS INSURANCE CO., DBA NAVIGATORS PROTECTION &**  
6 **INDEMNITY [NO ORAL ARGUMENT REQUESTED]**, to the following:  
7

8 Mike W. Schwab, Esq.  
9 OFFICE OF THE U.S. ATTORNEY  
10 108 Hernan Cortez Avenue, Suite 500  
Hagatna, Guam 96910

R. Michael Underhill  
Attorney in Charge, West Coast Office  
MIMI MOON  
Trial Attorney  
Torts Branch, Civil Division  
U.S. DEPARTMENT OF JUSTICE  
450 Golden Gate Avenue, Room 7-5395  
P.O. Box 36028  
San Francisco, CA 94102-3463  
[Courtesy copy]

14 *Attorneys for Plaintiff and Counterdefendant United States of America*

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[Courtesy copy]

19 *Attorneys for Defendants and Cross-Defendants Marwan Shipping & Trading Co.;*  
20 *Five Seas Shipping Co., LLC; and Al-Buhaira National Insurance Company*

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6 Hagatna, Guam 96910

7 *Attorneys for Third Party Defendant Inchcape Shipping Services Guam LLC*

8 Dated this 5<sup>th</sup> day of February, 2008.

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10 DOROTHEA QUICHOCHO  
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